

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF IOWA
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Civil Action No. C94-1023
)	
vs.)	Hon. Michael J. Melloy
)	
MERCY HEALTH SERVICES and)	UNITED STATES' FIFTH
FINLEY TRI-STATES HEALTH)	RESPONSE TO DEFENDANTS'
GROUP, INC.,)	FIRST INTERROGATORIES
)	
Defendants.)	

**UNITED STATES' FIFTH RESPONSE TO
DEFENDANTS' FIRST INTERROGATORIES**

The United States makes the following supplemental response to Defendants' Interrogatory No. 8.

Interrogatory 8:

Identify each person who will or may testify as a non-expert witness in this cause, and, with respect to each person, describe in detail: (a) the general subject matter on which such witness is expected to testify.

Answer:

The United States expects to call the following individuals to testify at trial:

<u>Witness Name</u>	<u>Subject Matter</u>
Schemmel, Scott Paul, M.D. Medical Associates Clinic 100 Langworthy Dubuque, IA 52001 (319) 589-9161	Product market, geographic market, and competitive effects.

Bishop, Thomas
Chief Operating Officer
medical Associates Clinic
100 Langworthy
Dubuque, IA 52001
(319) 589-9950

Product market, geographic market,
competitive effects, and managed
health care.

Thomson, James K.
Vice President of Operations
John Deere Health Care
Represented by William Zessar
Vice Pres./Gen. Counsel
John Deere Health Care
1515 Fifth Ave., Suite 200
Moline, IL 61265
(309)765-1177

Product market, geographic market,
competitive effects, and managed
health care.

Van Bell, Richard J.
President
John Deere Health Care
Represented by William Zessar
Vice Pres./Gen. Counsel
John Deere Health Care
1515 Fifth Ave., Suite 200
Moline, IL 61265
(309)765-1177

Product market, geographic market,
competitive effects, and managed
health care.

The United States may also call the following individuals to
testify at trial:

Witness Name

Cremer, Lawrence E.
Medical Associates HMO
One Cycare Plaza, Suite 230
Dubuque, IA 52001
(319) 556-8070

Subject Matter

Product market, geographic market,
competitive effects, and managed
health care.

Runde, Mark M.D.
Medical Associates Clinic
100 Langworthy
Dubuque, IA 52001
(319) 589-9890

Product market, geographic market,
competitive effects, and managed
health care.

Clark, Christopher M.D.
Medical Associates Clinic
100 Langworthy
Dubuque, IA 52001
(319) 589-9890

Product market, geographic market,
competitive effects, and managed
health care.

Guetzko, Gary
Vice President of Financing
Mercy Health Center
Mercy Drive
Dubuque, IA 52001
(319) 589-6021

Product market, geographic market,
competitive effects, managed health
care, background of Finley & Mercy,
and promotion of DRHS, as well as
defendants' claimed efficiencies
and transfers of money from Mercy
Health Center to its parents or
affiliates.

Sister Helen Huewe, O.S.f.
President/CEO
Mercy Health Center
Mercy Drive
Dubuque, IA 52001
(319) 589-8000

Product market, geographic market,
competitive effects, managed health
care, background of Finley and
Mercy, and promotion of DRHS.

Kevin Rogols
President/CEO
The Finley Hospital
360 N. Grandview Ave.
Dubuque, IA 52001
(319) 589-2413

Product market, geographic market,
competitive effects, managed health
care, background of Finley and
Mercy, and promotion of DRHS.

Terry L. Steele
Vice Pres./CFO
The Finley Hospital
360 N. Grandview Ave.
Dubuque, IA 52001
(319) 589-2373

Product market, geographic market,
competitive effects, managed health
care, background of Finley and
Mercy, and promotion of DRHS, as
well as defendants' claimed
efficiencies.

Rod Tokheim
Vice Pres. of Marketing &
Planning
The Finley Hospital
360 N. Grandview Ave.
Dubuque, IA 52001
(319) 589-8056

Product market, geographic market,
competitive effects, managed health
care, background of Finley and
Mercy, and promotion of DRHS.

David Shaller
Administrative Director of
Medical Staff & Community
Relations
The Finley Hospital
360 N. Grandview Ave.
Dubuque, IA 52001
(319) 582-1881

Product market, geographic market,
competitive effects, managed health
care, background of Finley and
Mercy, and promotion of DRHS.

At present, no final decision has been made about which witnesses
the United States will call.

Dated: August 2, 1994

Mary Beth McGee
Eugene D. Cohen
Jessica N. Cohen

U.S. Department of Justice
Antitrust Division
555 4th Street, N.W. Room 9901
Washington, D.C. 20001
Tel: (202) 307-1027
Fax: (202) 514-1517

VERIFICATION

I, Jessica N. Cohen, declare:

1. I am an attorney with the United States Department of Justice, Antitrust Division.

2. I verify that authorized employees and counsel for the United States assembled the facts stated herein; and that the facts herein are true and correct to the best of my knowledge, information, and belief.

3. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, D.C. on _____, 1994.

JESSICA N. COHEN